

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION**

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

This document relates to:

“Track One Cases”

**DEFENDANTS AMERISOURCEBERGEN DRUG CORP., CARDINAL HEALTH, INC.,
AND McKESSON CORP.’S MOTION FOR LEAVE TO FILE DISTRIBUTORS’ REPLY
IN SUPPORT OF DEFENDANTS’ PARTIAL OBJECTIONS TO DISCOVERY RULING
NO. 17 UNDER SEAL**

AmerisourceBergen Drug Corporation, McKesson Corporation, and Cardinal Health, Inc. (the “Distributors” or “Defendants”) seek leave to file their Reply in Support of Distributors’ Partial Objections to Discovery Ruling No. 17 under seal on March 29, 2019. Distributors file this Motion and Proposed Order (Exhibit A) to ensure compliance with this Court’s Case Management Order Number Two: Protective Order. *See* ECF No. 441 (hereinafter “Protective Order”).

Local Rule 5.2 states: “No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents.”

The Protective Order in this case states:

Only Confidential or Highly Confidential portions of relevant documents are subject to sealing. To the extent that a brief, memorandum, or pleading references any document designated as Confidential or Highly Confidential, then the brief, memorandum or pleading shall refer the Court to the particular exhibit filed under seal without disclosing the contents of any confidential information. If, however, the confidential information must be intertwined within the text of the document, a party may timely move the Court for leave to file both a redacted version for the public docket and an unredacted version for sealing.

Protective Order ¶ 62.

Distributors' Reply will contain confidential information that is subject to the Court's Protective Order. Therefore, Distributors respectfully request leave to file their Reply under seal so there is no disclosure of confidential information subject to Protective Order. Distributors will file a public version of their Reply, redacting confidential information.

WHEREFORE, Distributors' respectfully request this Honorable Court grant Distributors' Motion for Leave to File Distributors' Reply in Support of Defendants' Partial Objections to Discovery Ruling No. 17 Under Seal.

DATED: March 28, 2019

Respectfully submitted,

/s/ Shannon E. McClure

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2019, I caused the foregoing document to be served via the Court's ECF system to all counsel of record.

/s/ Shannon E. McClure

Shannon E. McClure

Counsel for Distributor Defendant

AmerisourceBergen Drug Corporation

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